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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE EASTERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,) Case No. 2:21-cr-105-TLN
18 Plaintiff,)
19 vs.) **STIPULATION AND ORDER TO CONTINUE**
20 BRENT EDWARD HOOTON,) **STATUS CONFERENCE AND EXCLUDE TIME**
21 Defendant.)
22 _____)
23) Date: October 7, 2021
24) Time: 9:30 a.m.
25) Judge: Hon. Troy L. Nunley
26)
27)
28)

16 IT IS HEREBY STIPULATED and agreed by and between Acting United States
17 Attorney Phillip A. Talbert, through Assistant United States Attorney Mira Chernick, counsel for
18 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmoammadi, counsel for Defendant Brent Edward Hooton, that the status hearing currently
20 set for October 7, 2021 at 9:30 be continued to December 2, 2021 at 9:30 a.m.

21 The parties specifically stipulate as follows:

22 1. By previous order, this matter was set for a status on October 7, 2021 at 9:30 a.m.
23 2. Mr. Hooton now moves to continue the status conference to December 2, 2021 at 9:30
24 a.m.
25 3. The government has discovered over 600 pages and various video and audio recordings
26 to the defense.
27 4. The defense requires time to review the discovery; investigate and research possible
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defenses; research potential pretrial motions; consult with Mr. Hooton; explore potential resolutions to the case; and otherwise prepare for trial.

5. Defense counsel believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* U.S.C. § 3161(h)(7)(B)(iv).
6. The government does not object to the continuance.
7. The parties jointly request the Court to find that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Hooton in a speedy trial; and for the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), that the time period between October 7, 2021 and December 2, 2021, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) (Local Code T4).

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: October 4, 2021

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Hooton

Date: October 4, 2021

PHILLIP A. TALBERT
United States Attorney

/s/ Mira Chernick
Mira Chernick
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: October 4, 2021

Troy L. Nunley

Troy L. Nunley
United States District Judge